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*Executive Director*

January 29, 2018

Hon. Ajit Pai, Chairman, Hon. Mignon Clyburn, Hon. Michael O'Rielly,  
Hon. Brendan Carr, Hon. Jessica Rosenworcel, Commissioners  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

**Re: Comments on GN Docket No. 17-258, Federal Communications Commission  
Promoting Investment in the 3550-3700 MHz Band**

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr,  
and Commissioner Rosenworcel:

The Port of Los Angeles ("Port") appreciates this opportunity to provide comment on the promotion of investment in the 3550-3700 MHz Band (3.5 GHz Band). The Port is currently pioneering the digitization of the maritime supply chain in an effort to enhance operational efficiency, reduce air emissions, and better serve the shipping community through greater transparency and reliability. Our ability to realize the full potential of this effort relies on the ability to secure and access spectrum. For this reason, we agree with numerous other industrial and critical-infrastructure parties in this proceeding and encourage the Federal Communications Commission (FCC) to maintain the rules established in 2015 for the Citizens Broadband Radio Service (CBRS).

The Port of Los Angeles is the nation's largest and busiest container port – handling 9.3 million container units in 2017. Cargo that passes through the Port reached every corner of the United States – and when combined with cargo at the neighboring port in Long Beach – generates over \$310 billion in national economic impact and 3 million jobs. However, changes in the maritime shipping industry – including the advent of ultra-large container vessels, carrier alliances, and divestment of chassis assets – have tested the physical and operational limits of our facilities. Increasingly, our industry is looking to leverage big data and industrial Internet of Things (IoT) platforms in order to achieve greater efficiencies.

As part of this movement, the Port of Los Angeles is pioneering the use of advanced data sharing and visibility across all port stakeholders. Having completed a pilot on advanced data sharing, we are expanding the solution across the port complex. Our objective is to lead other ports and the broader maritime shipping industry in this direction and spur additional innovation. However, full development and deployment of these industrial IoT technologies in a sprawling, 7,500 acre complex like the Port of Los Angeles relies on predictable access to the 3.5 GHz spectrum.

We ask that you do not change the CBRS rules by increasing the geographic areas covered by Priority Access Licenses (PALs) from census tracts to Partial Economic Areas (PEAs). Furthermore, we are concerned with a proposed increase in license terms to 10-years. Such changes would impede industrial IoT utilization and delay the innovation that ports and the shipping industry are on the cusp of delivering.

Thank you for your consideration.

Sincerely,



EUGENE D. SEROKA  
Executive Director

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